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Attorneys for plaintiff, Juan Carlos Vera

**UNITED STATES DISTRICT COURT
IN AND FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

JUAN CARLOS VERA, an individual,)	Case No. 10-cv-01422-L-JMA
Plaintiff,)	
v.)	PLAINTIFF'S DISCLOSURES PURSUANT
)	TO FRCP RULE 26(a)(3)
JAMES O'KEEFE III, an individual,)	
HANNA GILES, an individual, and DOES)	
1-20 inclusive,)	
Defendants.)	
_____)	

COMES NOW, Plaintiff JUAN CARLOS VERA, by and through his attorneys of record, and hereby provides the following Disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure:

A. WITNESSES:

The following persons witnesses Plaintiff will call to support his claims:

1. Plaintiff Juan Carlos Vera
2. Defendant James O'Keefe

- 1 3. Hannah Giles
- 2 4. David Lagstein
- 3 5. Cruz Acosta
- 4 6. Mar Murrillon
- 5 7. Detective Alejandro Hernandez, National City Police Dept.
- 6 8. Detective Steve Villarias, National City Police Dept.
- 7 9. Detective Mark Haas, San Diego Police Dept.
- 8 10. Maria de Lourdes de Vera
- 9 11. Arlet Vera
- 10 12. Maura Larkins
- 11 13. Rosa Madrigal
- 12 14. Mar Morillon
- 13 15. Alex Hernandez
- 14 16. Luis Hernandez
- 15 17. Mark Widol
- 16 18. Dilia Cade
- 17 19. Alina Azar
- 18 20. Martha Esparza
- 19 21. Miguel Esparza
- 20 22. Issac Esparza
- 21 23. Eleazar Vera
- 22 24. Gaby Castellanos
- 23 25. Luis Castañeda
- 24 26. Miguel Esparza

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1 B. DOCUMENTS:

2 The following documents and/or tangible things are evidence plaintiff intends to use to
3 support his claims:

- 4 1. Documents from the California Attorney General investigation
- 5 2. Termination memo from ACORN
- 6 3. Video/audio recordings of Juan Carlos Vera
- 7 4. O'Keefe Interrogatory Responses
- 8 5. O'Keefe Responses to Request for Production of Documents
- 9 6. O'Keefe Responses to Request for Admission
- 10 7. O'Keefe deposition transcript
- 11 8. O'Keefe deposition video
- 12 9. Giles deposition transcript
- 13 10. Giles deposition video
- 14 11. O'Keefe employment contract
- 15 12. Medical records of Juan Carlos Vera
- 16 13. Telephone records of Juan Carlos Vera
- 17 14. Certificate of training from ACORN
- 18 15. Recognition for Department of Treasury
- 19 16. Letter from the Department of Treasury
- 20 17. Photograph of Juan Carlos Vera
- 21 18. Television broadcasts regarding the O'Keefe taping of Juan Carlos Vera
- 22 19. Newspaper articles regarding the O'Keefe taping of Juan Carlos Vera
- 23 20. Diagram of ACORN offices

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Respectfully submitted,

Dated: July 2, 2012

S/ Eugene Iredale

EUGENE G. IREDALE

JULIA YOO

Attorneys for Plaintiff

JUAN CARLOS VERA